

James Meyer Consulting, Inc.
13851 Echo Drive
Sutter Creek, CA 95685

Office Phone: (209) 267-0950
Cell Phone: (916) 952-6933
meyerconsulting@verizon.net

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RECEIVED

Keith Umemoto, Executive Officer
Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

OCT 19 2006
OCCUPATIONAL SAFETY AND HEALTH
STANDARDS BOARD

Re: Petition

Dear Mr. Umemoto:

James Meyer Consulting, Inc. is submitting this petition on behalf of Smith & Loveless, Inc. to the Occupational Safety and Health Standards Board to include in Section 3000(d), "Devices Excluded. These orders do not apply to the following:" of the Elevator Safety Orders as an exclusion, the following: **"(14) Maintenance Lifts as used to access underground pumping stations"**.

The Maintenance Lift is designed to be installed in pump stations to provide assistance to trained, authorized personnel to adequately maintain the pump station. The pump station has restricted access and the lift is not accessible by the public. The first installation of the Maintenance Lift by Smith & Loveless, Inc. took place in the early sixties and hundreds have been installed since that date. The lift does resemble an elevator in that it rides on guide rails and serves two landings. It is contained within the entrance tube structure as provided by the Manufacturer. The lift is fabricated and assembled by the Manufacturer, the car is factory tested prior to shipping.

The car has a minimum four foot square floor area, is suspended by two wire ropes, and incorporates four sets of guide wheels to keep the car in alignment on the guide rails. The car is enclosed on three sides by steel framework with a collapsible folding gate covering the entrance. This design allows access to the components of the entrance tube for maintenance purposes. Constant pressure controls are located on the car and in the pumping station assuring complete control by the authorized user. No controls are located outside of the station.


There is no pit under the car as found on a typical elevator installation. The car stops above the lower level and the authorized user steps off the car. Many times the car is then raised to a height which allows access under the lift as needed to perform the necessary maintenance in the station. The car travel speed is limited to 35 fpm.

The design of the lift does include various safety features including but not limited to an electrically released motor brake, an emergency stop switch, a centrifugal overspeed device, a mechanically released car brake (locking cams), redundant top and bottom travel limit switches, an under car safety switch, a slack cable switch, and various other electrical safety devices. The design of the lift may vary from location to location depending on the layout and needs of that particular pump station. The differences are in the entrance to the car and the travel of the lift. The car itself, its safety mechanisms, and the controls remain consistent.

In contrast to an elevator, this lift serves a dual purpose. The floor of the lift is removable and the tube in which the lift is installed can be used as an emergency escape route in the event an operator is required to exit the station and the lift is inoperable. A permanently installed ladder in this tube allows access to and from the pumping station if there is no power, and there is no enclosed shaft or car structure limiting the exit of operations personnel.

In the early 80's the Division chose not to get involved with these lifts as there was no history of safety problems with them. Unfortunately there was no documentation developed at that time indicating how these lifts were to be handled. Since that time there have been no inspections conducted on these lifts and only recently have they resurfaced after a complaint was received that no inspection certificate was present on a lift in West Sacramento. As this lift did not and could not meet the Elevator Safety Orders, the lift was removed from service. This lift was a vital part of maintaining the pumping station and after reconsideration the "red tag" was removed and operation was allowed to continue until a decision was made regarding this petition. The decision to allow the continued service of this lift was made after reviewing the design details and understanding there have been no safety concerns raised during some forty years of operation. Due to the constraints of the environment in which these lifts are installed, the installation cannot meet the Elevator Safety Orders, including the "Special Purpose Personnel Elevators" Article. If you have any questions regarding the Maintenance Lift feel free to contact me. Thank you very much for your consideration in this matter.

Sincerely,



James L. Meyer
Consultant

cc: Rodney S. Mrkvicka, P.E.
Vice President Engineering
Smith & Loveless